

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOSEPH MARVIN FEAGLE, II,
a minor under the age of 18, by his
natural mother and guardian,
KAREN D. FEAGLE

Plaintiff,

Case No.

v.

TRANSWORLD SYSTEMS, INC.,
a Pennsylvania Corporation,

Defendant.

_____ /

NOTICE OF REMOVAL

Defendant, Transworld Systems, Inc. (“TSI”), through counsel, files this notice of the removal of this action from the Magistrate Court of Dekalb County, State of Georgia to the U.S. District Court for the Northern District of Georgia, and respectfully states as follows:

1. TSI is a defendant in this civil action filed by plaintiff, Joseph Marvin Feagle, II, a minor under the age of 18, by his natural mother and guardian, Karen D. Feagle (“plaintiff”), in the Magistrate Court of Dekalb County, State of Georgia titled *Joseph Marvin Feagle, II, a minor under the age of 18, by his natural mother and guardian, Karen D. Feagle v. Transworld Systems, Inc.*, Case # 16M61452 (hereinafter the “State Court Action”).

2. The defendant removes this case pursuant to 28 U.S.C. § 1441, as plaintiff's Complaint purports to allege causes of action against the defendant that arise under federal law, including the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227, *et seq.*

3. Pursuant to 28 U.S.C. § 1446(b), the defendant has timely filed this Notice of Removal. TSI was served with plaintiff's Complaint on April 19, 2016. This Removal is filed within 30 days of service of the Complaint by TSI.

4. Attached hereto and incorporated by reference as part of the Notice of Removal are true and correct copies of the Civil Cover Sheet, Complaint and process and pleadings in the State Court Action. No further proceedings have taken place in the State Court Action.

5. A copy of this Notice of Removal is being served upon plaintiff and filed concurrently with the Magistrate Court of Dekalb County, State of Georgia.

WHEREFORE, Defendant, Transworld Systems, Inc., hereby removes to this Court the State Court Action.

Respectfully submitted,

/s/ Wendi E. Fassbender

Wendi E. Fassbender, Esq.

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Attorneys for

Transworld Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of May 2016, a copy of the foregoing was filed via the court electronic system. A true and correct copy of the foregoing was sent via email to plaintiff's counsel as described below.

Cliff R. Dorsen, Esq.

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Tucker, GA 30084

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I additionally certify that the above-referenced document has been prepared in Times New Roman (14 point) font and this satisfies the font size requirements of this Court.

/s/ Wendi E. Fassbender

Wendi E. Fassbender, Esq.